

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 20-cv-13293
)	
INTERNATIONAL UNION, UNITED)	
AUTOMOBILE, AEROSPACE, AND)	
AGRICULTURAL IMPLEMENT WORKERS)	
OF AMERICA,)	Hon. David M. Lawson
)	
Defendant.)	

**DEFENDANT UAW’S RESPONSE IN SUPPORT OF THE
MOTION TO APPOINT NEIL M. BAROFSKY AS MONITOR**

Defendant International Union, United Automobile, Aerospace, and Agricultural Implement Workers of America (“UAW”), by its attorneys, Terence H. Campbell and Eric S. Pruitt of Cotsirilos, Tighe, Streicker, Poulos & Campbell, respectfully submits this brief Response in Support of the Motion to Appoint Neil M. Barofsky as Monitor.

On April 12, 2021, the Government filed a Motion For Appointment of Monitor which requests the Court to appoint Neil M. Barofsky as Monitor. (Dkt. #28). As the Government noted in its Motion, the parties abided by the terms of the Consent Order entered by the Court on January 29, 2021, and the UAW agrees with the request to appoint Mr. Barofsky as the Monitor. *Id.* at 1, 5.

As set forth in the Government’s motion, Mr. Barofsky is highly respected and well-qualified to perform the duties of the Monitor in this case, and he has assembled an equally experienced and able team to support him in that work. *Id.* at 6-8. So the Court has a fuller summary of Mr. Barofsky’s background, we have attached Mr. Barofsky’s *curriculum vitae* as

Exhibit A hereto.

CONCLUSION

For the reasons set forth herein, we respectfully request that the Court grant the Motion to Appoint Neil M. Barofsky as Monitor.

Respectfully submitted,

/s/ Terence H. Campbell

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that a true and correct copy of the foregoing *UAW's Response in Support of the Motion to Appoint Neil M. Barofsky as Monitor* was served electronically on other counsel of record on April 20, 2021 via the CM/ECF system.

/s/ Terence H. Campbell